

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**KAREN WHITE,**

**Plaintiff**

**v.**

**CIVIL NO. 3:12-cv-00115-REP**

**BMW OF NORTH AMERICA, LLC.,**

**Defendant.**

**PLAINTIFF'S F.R.C.P. 26(a)(1) DISCLOSURES**

COMES NOW the Plaintiff, KAREN WHITE, by counsel, and makes the following disclosures:

**I. Individuals likely to have discoverable information**

Plaintiff, KAREN WHITE.

***All facts.***

Plaintiff's husband, DANIEL LEE WHITE.

Employees of Defendant, BMW of North America, LLC.

***All facts regarding the subject matter of the complaint.***

Employees of Casey Auto Group/Casey BMW

***All facts regarding the repairs and/or warranty work to Plaintiff's vehicle and the merchantability of same.***

Employees of Casey Auto Group/Casey BMW

***All facts regarding the purchase of Plaintiff's vehicle.***

Employees of BBB Auto Line.

***All facts regarding the Plaintiff's complaint filed with BBB Auto Line.***

Employees of BMW Financial Services.

***All facts regarding the financing of the subject vehicle.***

Employees of Allstate Property and Casualty Insurance Company.

***All facts regarding the premiums paid for insurance on the subject vehicle.***

Judith C. Wells, Treasurer of Isle of Wight.

***All facts regarding payment of personal property taxes on the subject vehicle.***

Unknown persons as may be revealed in discovery.

All witnesses identified by the Defendants.

**II. Description of documents in possession of the Plaintiff.**

Other than those documents obtained from any Defendant in discovery, the Plaintiff has the following documents in his possession and control:

Plaintiff's Bate Stamp Nos. 000001 – 000380

**III. Computation of Damages**

**Itemization Of Damages**

The Plaintiff seeks damages as follows:

*Plaintiff's full purchase price of the vehicle: \$64,956.70*

*Plaintiff's cost of insurance for the vehicle from date of purchase: \$2,506.50*

*Plaintiff's cost of personal property taxes paid from date of purchase: \$1,525.86*

*Plaintiff's loss of time at \$35.00 per hour: In excess of \$5,000.00*

*Plaintiff's loss of use and enjoyment of the vehicle for an unliquidated amount to be determined at trial, but in excess of \$10,000.00.*

Plaintiff reserves the right to further supplement these disclosures.

KAREN WHITE,

/s/

Leonard A. Bennett, Esq.

VSB #37523

Attorney for Plaintiff

CONSUMER LITIGATION

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 3<sup>rd</sup> day of July, 2012, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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/s/

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